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September 20, 1994

BY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, DC 20554

RE: CC Docket No. 92-166 EX PARTE PRESENTATION

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's Rules [47 C.F.R. § 1.206], I hereby notify the Commission that copies of the enclosed letter dated September 20, 1994, from Douglas G. Dwyre, President of Loral/QUALCOMM Partnership, L.P., to The Honorable Vonya McCann, Assistant Secretary of State for Communication and Information, were hand-delivered to Chairman Reed Hundt, Scott Harris, Cecily Holiday and Tom Tycz.

Two copies of this letter with the enclosure are being provided for inclusion in the above-referenced docket.

Respectfully submitted,

William D. Wallace

Enclosure

cc: The Honorable Reed Hundt
Scott Harris
Cecily Holiday
Tom Tycz

Globalstar

3200 Zanker Road
P.O. Box 640670
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Douglas G. Dwyre
President

20 September 1994

The Honorable Vonya McCann
Assistant Secretary of State
for Communication and Information
Office of International Communication
and Information Policy
U. S. Department of State
Room 6317
Washington, D. C. 20520-7310

Dear Assistant Secretary McCann:

The purpose of this letter is to urge the U. S. Department of State, at the upcoming meetings between the United States and Russia concerning coordination of the GLONASS satellite systems, to ensure that the interests of the United States mobile satellite industry are fully taken into consideration in developing any agreement that may be reached.

As you are aware, proposed U. S. mobile satellite systems, such as Loral QUALCOMM Partnership, L.P.'s Globalstar, plan to use spectrum in the 1610-1626.5 MHz band. This spectrum will be shared by a number of U. S. - licensed as well as non-U.S. systems. The availability of the entire band is critical to the ability of these systems to provide global communications where none is now available, to provide adequate capacity for first generation systems, and to achieve the business objectives necessary for economic success.

Russia, which currently operates the GLONASS systems in a portion of the 1610-1626.5 MHz band, has proposed a revision to the GLONASS frequency plan, in a three-step approach, to eliminate interference into radioastronomy operations, to minimize coordination with MSS and to enhance the usefulness of GLONASS as a possible component of the Global Navigation Satellite Systems (GNSS). The GNSS, to be comprised of GPS, possibly GLONASS, and other augmentations to satellite-based navigation, will provide low-cost and extremely accurate navigation for aircraft.

LQP is concerned that the U.S. government, in the interest of comity, may agree to coordinate the Russian GLONASS and GLONASS-M system, and agree to the proposed three step transition plan, without full consideration of the impact of such an action. As LQP has discussed in meetings with U. S. Department of State, officials and other government representatives, coordination of the interim GLONASS-M configuration could cause confusion as to the extent of protection that should be provided by MSS systems to GLONASS-M receivers operating in accordance with the interim frequency plan. In fact, as LQP has repeatedly stated, any recognition of the interim plan could work a disservice to MSS, without any concomitant benefit to aviation navigation.

It is unlikely that the standards concerning the use of GLONASS-M within the GNSS will be developed, the specifications for receivers adopted, and equipment built and installed in aircraft before the 2005 date for implementation of the final GLONASS-M frequency configuration. However, if the United States agrees to coordinate the interim GLONASS-M frequency configuration, this could lead to efforts to require protection of receipt of such signals from MSS. Establishment of stringent protection criteria by the aviation community, if adopted by the FCC, could reduce the amount of spectrum available for MSS use by 2 to 4 MHz. Moreover, protection of the interim GLONASS-M frequency plan could create a disincentive to Russia to move expeditiously towards the ultimate frequency configuration.

In summary, LQP urges the United States to agree to coordinate GLONASS-M only in the final frequency configuration, i.e., operation only on changes -7 to +4 (highest frequency carrier at or below 1604.25 MHz). This could create an incentive for Russia to expedite the transition to the final configuration, enable the aviation community to proceed with consideration of the use of GLONASS-M based on such configuration, provide useful guidance in the development and manufacture of avionics equipment, and enable MSS systems to proceed without unreasonable constraints imposed by the need to protect the interim GLONASS configuration.

Sincerely,

Douglas G. Dwyre, President
Globalstar

cc: The Honorable Reed Hundt, FCC
The Honorable Larry Irving, NTIA